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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3:18-CR-00072-HZ**

**v.**

**GOVERNMENT'S REQUEST FOR  
PRETRIAL DISCOVERY**

**TYRONE LAMONT ALLEN,**

**Defendant.**

Pursuant to Fed. R. Crim. P. 16(b), the United States of America, by Billy J. Williams, United States Attorney for the District of Oregon, and Paul T. Maloney, Assistant United States Attorney, hereby requests that defendant make the following materials available for inspection and copying as soon as practicable.

1. All books, papers, documents, data, photographs, tangible objects, or copies or portions thereof, which are in defendant's possession, custody, or control, and which defendant intends to use during his case-in-chief at trial. Fed. R. Crim. P. 16(b)(1)(A).

2. All results or reports of physical or mental examinations or scientific tests or experiments made in connection with this case, which are within defendant's possession,

custody, or control, and which defendant intends to introduce as evidence in defendant's case-in-chief at trial. Fed. R. Crim. P. 16(b)(1)(B)(i).

3. All results or reports of physical or mental examinations or scientific tests or experiments made in connection with this case, which were prepared by a witness whom defendant intends to call at trial, insofar as the results or reports related to the witness's testimony. Fed. R. Crim. P. 16(b)(1)(B)(ii).

4. Written summaries of any expert testimony defendant intends to introduce at trial, describing each expert's opinions and the bases and reasons for those opinions, and each expert's qualifications. Fed. R. Crim. P. 16(b)(1)(C).

5. All statements (as defined in Fed. R. Crim. P. 26.2(f)) of any defense witness, however recorded, which relate to the subject matter of the witness's testimony. Fed. R. Crim. P. 26.2.

Pursuant to Fed. R. Crim. P. 16(c), this is a continuing request for discovery. Therefore, if after producing the materials described herein, defendant discovers any additional such material, defendant should promptly notify the government of its existence and provide the government with the opportunity to inspect and copy it.

DATED this 12<sup>th</sup> day of July, 2019.

Respectfully submitted,

BILLY J. WILLIAMS  
United States Attorney

/s/ Paul T. Maloney  
PAUL T. MALONEY  
Assistant United States Attorneys